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9 *GALAXY GAMING, INC.*

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**UNITED STATES DISTRICT COURT**

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**DISTRICT OF NEVADA**

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16 AGS, LLC, a Delaware limited liability  
17 company; RED CARD GAMING, INC., a  
18 Nevada corporation,

19 Plaintiffs and Counter-Defendants,  
v.

20 GALAXY GAMING, INC., a Nevada  
21 corporation,

22 Defendant and Counterclaimant.

Case No. 2:14-cv-02018-JAD-CWH

**STIPULATION REGARDING RULE 26(f)  
DISCOVERY PLAN AND [PROPOSED]  
ORDER REGARDING RULE 16(b)  
SCHEDULING ORDER**

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Pursuant to Rules 26(f) and 26(a)(1)(B)(viii)-(ix) of the Federal Rules of Civil Procedure and Local Rule 26-1, Plaintiffs and Counter-Defendants AGS, LLC (“AGS”) and Red Card Gaming, Inc. (“Red Card”) (collectively, “Plaintiffs”), by and through their counsel, Holland & Hart LLP, and Defendant and Counterclaimant Galaxy Gaming, Inc. (“Galaxy” or “Defendant”), by and through its counsel Watson Rounds, hereby stipulate and agree as follows:

1           The parties have filed competing motions for preliminary injunction. (Dkt. #8; Dkt. #15).  
 2 Defendant also filed a Motion to Compel Arbitration (Dkt. #24), and Plaintiffs filed a Limited  
 3 Opposition thereto (Dkt. #38) that did not dispute the arbitration provision in the September 21,  
 4 2012 Asset Purchase Agreement (“APA”) between Red Card and Galaxy. All of these motions  
 5 are scheduled for hearing on April 6, 2015. The current substantive issues in those motions to be  
 6 decided by this Court relate to (i) the parties’ motions for preliminary injunction, which have  
 7 been fully briefed, and (ii) which tribunal should decide the motions for preliminary injunction.  
 8 Defendants additionally filed multiple Motions to Seal (Dkt. #14, 19, 23, 47, 54), and Plaintiffs  
 9 additionally filed a Motion to Strike Defendant’s Reply (Dkt. #60).

10           Accordingly, the parties stipulate and agree that discovery in this District Court action  
 11 should be stayed, and that no Scheduling Order is necessary, at this time. Plaintiffs and  
 12 Defendant each reserve the right to request, and this Stipulation is without prejudice to such a  
 13 request (if any), for discovery and/or a scheduling order in this matter should the need arise, for  
 14 example, due to the parties’ competing motions for preliminary injunction and/or Plaintiffs’  
 15 Motion to Strike.

16           DATED: March 10, 2015

17           **HOLLAND & HART LLP**

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 19           /s/ *Ryan J. Cudnik*  
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 22           *Attorneys for Defendant*

**ORDER**

24           **IT IS SO ORDERED.** The parties are directed to file a joint status report within ten days  
 25 of the district judge deciding either the pending motion to compel arbitration (doc. # 24)  
 or the motions for preliminary injunction (docs. # 8, # 15).

26           DATED: April 17, 2015

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 28           \_\_\_\_\_  
 United States Magistrate Judge

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date a true and correct copy of the foregoing document, **STIPULATION REGARDING RULE 26(f) DISCOVERY PLAN AND [PROPOSED] ORDER REGARDING RULE 16(b) SCHEDULING ORDER**, will be served upon counsel of record via electronic mail through the United States District Court's CM/ECF system.

DATED March 10, 2015

/s/ Jeff Tillison  
An Employee of Watson Rounds